

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

BRYAN SAMS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 24-cv-00602-CVE-SH
)	
JOHNSON MATTHEY INC., d/b/a)	Removed from Tulsa County
TRACERCO, a foreign corporation,)	Case No. CJ-2024-4271
THE UNIVERSITY OF TULSA, a not-for-)	
profit Oklahoma Corporation,)	
CHEVRON USA, INC., a foreign corporation)	
CHASE ENVIRONMENTAL GROUP, INC.)	
a foreign corporation,)	
CHINA INSTITUTE OF ATOMIC ENERGY)	
a foreign corporation,)	
)	
Defendants.)	

**UNOPPOSED/AGREED MOTION FOR EXTENSION OF TIME TO SUBMIT
DISMISSAL PAPERS PRIOR TO CASE CLOSURE**

COMES NOW, JOHNSON MATTHEY INC., d/b/a TRACERCO (“Tracerco”) and hereby requests an extension of the administrative closing deadline and date to submit the Joint Motion to Dismiss with Prejudice with its accompanying Agreed Order of Dismissal with Prejudice (“dismissal papers”) to June 13, 2025. In support thereof, Tracerco states as follows:

1. As the Court is aware, the parties have reached a settlement [see Doc. 42] and are diligently finalizing the written settlement documents and dismissal papers. Per Doc. 43, the parties are to file the dismissal papers by May 30, 2025.
2. Despite their diligence, the parties need an additional fourteen (14) days, or until June 13, 2025, to finalize these tasks and file the dismissal papers.

3. This motion is unopposed and/or agreed to by all parties. No party will be prejudiced by the request.

4. This request is sought in good faith and not for the purpose of delay. As the case has settled and is administratively closed, there is no active schedule or trial setting; thus, granting this motion will not affect any deadlines.

5. A proposed order is being submitted simultaneously to the Court for consideration under LCvR7-1(g).

WHEREFORE, Defendant Tracerco, on behalf of all parties, respectfully requests that the Court issue an Order extending the deadline for the parties to file the dismissal papers to June 13, 2025.

Respectfully submitted this 30th day of May 2025.

**DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.**

By: s/Kaylee P. Davis-Maddy

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***Attorneys for Johnson Matthey Inc.,
d/b/a Tracerco***

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2025, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the ECF registrants.

/s/ Kaylee P. Davis-Maddy

Kaylee P. Davis-Maddy

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